

Coastside County Water District (Coastside CWD) appreciates the efforts of the Independent Technical Panel to provide recommendations on demand management measures in the Urban Water Management Planning Act. Coastside CWD is small special district serving treated water to an urban and rural population that is a mix of residences, visitor serving establishments and agriculture, with less than 8,000 service connections. Streamlining reporting requirements would benefit Coastside CWD and allow for limited resources to be focused on reducing water demand and meeting SBx7-7 water use compliance. Due to limited staffing resources, smaller water agencies often do not have the opportunity to participate in public processes affecting mandatory reporting and legislation. Please consider the limited resources of smaller water agencies when writing your recommendations on demand management measures and mandatory reporting.

Recommendation #1: Amend the Urban Water Management Planning Act to Simplify and Update the Demand Management Measure Reporting Requirements

Under the recommended statutory language for Section 10631(f) and (g), the consolidation to seven measures is a good step toward streamlining reporting while still providing a description of demand management measures.

Recommendation #2: Require Distribution System Water Loss Reporting in UWMPs

Under the recommended statutory language for Section 10631 (e) (1), it states that a worksheet approved by or developed by DWR and based on AWWA methodology will be required for reporting. Since the AWWA worksheet is already widely used by CUWCC member agencies, it would be best not to create additional reporting formats for the same purpose.

There is no mention of DWR providing a methodology to predict future distribution system water loss. If projecting distribution system water loss into the future is going to be a requirement, than DWR should provide guidance.

Recommendation #4: Voluntary Reporting on Projected Water Savings from Codes, Standards, Ordinances and Transportation and Land Use Plans Affecting an Urban Water Supplier's Service Area

Under the recommended statutory language to modify Section 10631(e), the language should clearly reflect the voluntary nature of reporting water savings from codes, standards, ordinance and transportation and land use plans. Please find suggested language below.

"(5) ~~When available and applicable to an urban water supplier, Water use projections may display and account for the water.....area. When applicable, The urban water supplier shall may provide citations of the various codes,.....projections. When applicable, Water suppliers shall may indicate the extent that the projections.....planning. Projections of water use that do not account for such savings shall be noted as such.~~"